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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,
Plaintiff,
v.
RADU GAL,
Defendant.

Case No. 2:19-CR-00017-APG-VCF

**Stipulation To Continue Sentencing
Hearing**
(First Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou, Acting United States Attorney, and Kimberly M. Frayn, Assistant United States Attorney, counsel for the United States of America, Todd Leventhal, Esq., counsel for Radu Gal, that the sentencing hearing in the abovementioned case, which is currently scheduled for May 27, 2021 at 10:30, be continued and reset to a date and time convenient to this Court, but not earlier than 60 days from the current hearing date for the following reasons:

1 1. The parties request that defendant Radu Gal's, (Gal), May 27, 2021
2 sentencing hearing be continued for at least 60 days, to a date and time convenient to the
3 Court. The parties will need additional time to digest the Court's upcoming sentencing of
4 codefendant John Badea, which is currently scheduled for June 1, 2021, and then to
5 prepare and file appropriate sentencing memorandum. Additional pre-hearing motion
6 practice may become necessary as well.

7 2. Gal is not incarcerated and does not object to the continuance.

8 3. The parties agree to the continuance and need additional time to properly
9 prepare for the sentencing hearing. The brief delay requested will not unduly prejudice
10 Gal.

11 4. The additional time requested herein is not sought for purposes of delay,
12 but merely to allow the parties sufficient time within which adequately prepare for the
13 sentencing hearing. Additionally, denial of this request for continuance could result in a
14 miscarriage of justice, and the ends of justice served by granting this request, outweigh
15 the best interest of the public and the defendant in a speedy hearing.

16 5. This is the first stipulation to continue the sentencing hearing.

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18 DATED this 19th day of May, 2021.

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20 CHRISTOPHER CHIOU
21 Acting United States Attorney

22 By /s/ Todd Leventhal, Esq.
23 TODD LEVENTHAL, ESQ.
24 Counsel for Radu Gal

25 BY /s/ Kimberly M. Frayn
26 KIMBERLY M. FRAYN
 Assistant United States Attorney

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

RADU GAL,

Defendant.

Case No. 2:19-CR-00017-APG-VCF

**Findings Of Fact, Conclusions Of Law
And Order**

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. The parties request that defendant Radu Gal's, (Gal), May 27, 2021 sentencing hearing be continued for at least 60 days, to a date and time convenient to the Court. The parties will need additional time to digest the Court's upcoming sentencing of codefendant John Badea, which is currently scheduled for June 1, 2021, and then to prepare and file appropriate sentencing memorandum. Additional pre-hearing motion practice may become necessary as well.

2. Gal is not incarcerated and does not object to the continuance.

3. The parties agree to the continuance and need additional time to properly prepare for the sentencing hearing. The brief delay requested will not unduly prejudice Gal.

4. The additional time requested herein is not sought for purposes of delay, but merely to allow the parties sufficient time within which adequately prepare for the sentencing hearing. Additionally, denial of this request for continuance could result in a

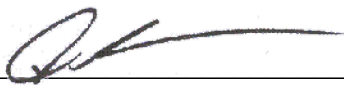
1 miscarriage of justice, and the ends of justice served by granting this request, outweigh
2 the best interest of the public and the defendant in a speedy hearing.

3 5. This is the first stipulation to continue the sentencing hearing

4 **ORDER**

5 THEREFORE, IT IS HEREBY ORDERED that the preliminary hearing in the
6 above-captioned matters, currently scheduled for May 27, 2021, be vacated and
7 continued to a date and time convenient to this Court, that is on August 4, 2021, at
8 9:00 a.m. in Courtroom 6C.
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12 DATED this 20th day of May 2021.

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16 HONORABLE ANDREW P. GORDON
17 United States District Court Judge
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